

Exhibit S

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO
ENTERO, et al.,

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Plaintiffs,

vs. CASE NO. 5:21-cv-844-XR

GREGORY W. ABBOTT, et
al.,

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§
§
§

Defendants.

OCA-GREATER HOUSTON, et
al.,

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§
§

Plaintiffs,

vs. CASE NO. 1:21-cv-780-XR

JOHN SCOTT, et al.,

§
§
§
§

Defendants.

HOUSTON JUSTICE, et al.,

§

Plaintiffs,

§

vs.

§

CASE NO. 5:21-cv-848-XR

GREGORY WAYNE ABBOTT, et
al.,

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§
§

Defendants.

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LULAC TEXAS, et al., §
§
Plaintiffs, §
§
vs. § CASE NO. 1:21-cv-0786-XR
§
JOHN SCOTT, et al., §
§
Defendants. §

MI FAMILIA VOTA, et al., §
§
Plaintiffs, §
§
vs. § CASE NO. 5:21-cv-0920-XR
§
GREG ABBOTT, et al., §
§
Defendants. §

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
vs. § CASE NO. 5:21-cv-1085-XR
§
THE STATE OF TEXAS, ET §
AL., §
§
Defendants. §

ORAL VIDEOTAPED DEPOSITION
CORPORATE REPRESENTATIVE OF
MI FAMILIA VOTA
MS. ANGELICA RAZO
April 5, 2022

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ORAL VIDEOTAPED DEPOSITION OF THE CORPORATE
REPRESENTATIVE OF MI FAMILIA VOTA, MS. ANGELICA RAZO,
produced as a witness at the instance of the
Defendants and duly sworn, was taken in the
above-styled and numbered cause on the 5th day of
April, 2022, from 9:52 a.m. to 7:05 p.m., before
Michelle Hartman, Certified Shorthand Reporter in and
for the State of Texas and Registered Professional
Reporter, reported by computerized stenotype machine
at the offices of Reed Smith LLP, 811 Main Street,
Suite 1700, Houston, Texas 77002, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

1 A. No.

2 Q. Any other community?

3 A. No.

4 Q. Okay. So when you say this is a bigger
5 impact on Latinos, what's your basis for saying that?

6 A. I'm saying that based off the community
7 that we serve, our -- the engagement that we've done,
8 at least in the past two, three, four years in Texas,
9 we've noted like just in the Latino community there
10 is a need for voter assistance.

11 Q. Understood. My question is a little
12 bit different. I guess what I'm asking you is: If
13 all you deal with is the Latino community by and
14 large, how would you have any idea what's going on in
15 other communities?

16 A. We work in coalition with several other
17 organizations that are focused on doing outreach to
18 the communities that you stated.

19 Q. Okay. Do you ever compare notes about
20 what level of assistance is needed?

21 A. Maybe to not the detail that you're
22 asking for.

23 Q. Well, I guess I'm trying to figure out,
24 if you're telling me Latinos need something more or
25 less than another group, how do you figure that out?

1 A. We know the different layers and -- we
 2 know the different layers that our community has
 3 again, naturalized citizens, they tend to be first
 4 time voters, new voters and frequent voters. Those
 5 are things that we can extrapolate based off
 6 population, data, and then also past voter turn out
 7 data. And so we look at the baseline of what is the
 8 existing voter education -- what is the level of
 9 voter education that our community has and what is
 10 The gap and what are the individualized -- what are
 11 the specific and unique moments where Latino voters
 12 might require more assistance than an average Texas
 13 voter.

14 Q. I get that you're comparing it to the
 15 average Texas voter, I'm asking you, are you
 16 comparing it to other racial groups?

17 A. No.

18 Q. Okay. So as you sit here today, it's
 19 great that you're comparing it to the average Texan,
 20 but you don't know how Latinos do compared to, for
 21 instance, Black Texans, White Texans, Asian Texans,
 22 and so forth?

23 A. No.

24 Q. So aside from -- I just want to close
 25 the loop on Section 6.05 here. If I understand you

1 Q. Let me ask you this: We talked earlier
2 today about vote harvesting, do you remember that?

3 A. Uh-huh, yes.

4 Q. Let's say a person in a nursing home is
5 a nurse, and she gets paid by somebody to go around
6 and gather voter registrations from everybody in the
7 nursing home, do you think that that nurse should be
8 allowed to not identify her relationship to the
9 people she's gathering registrations from?

10 A. Can you say that again?

11 Q. Sure.

12 A. Give me that example again.

13 Q. Sure. A nurse in a nursing home
14 gathers voter registrations from people in the
15 nursing home, so everybody in there, helps them fill
16 them out. Do you think that that nurse should be
17 allowed to not identify her relationship to the
18 people she's gathering registrations from?

19 A. I can't speak to that example. It's a
20 concern around voter harvesting?

21 Q. Well, I think it is. And so my
22 question to you is: Would you see that as a problem?

23 A. Our focus at Mi Familia Vota is to
24 ensure that the voting process and the people that
25 are assisting folks throughout the voting process

1 don't feel like they cannot help someone because they
2 have to give an identity or put down their name or
3 their relationship, that they get confused, tripped
4 up, accidentally put down something wrong.

5 Q. I understood you to say earlier that
6 Mi Familia Vota pays people who as part of their job,
7 also bring in registrations; is that right?

8 A. Correct.

9 Q. Does Mi Familia Vota have a problem
10 with their employees identifying their relationship
11 to the people that they're assisting?

12 A. Say that one more time.

13 Q. Does Mi Familia Vota have a problem
14 with their employees identifying their relationship
15 to the person that they're assisting?

16 A. Can you give me an example?

17 Q. Sure. I guess let's say one of your
18 employees, who as part of their job is gathering a
19 registration from someone, does Mi Familia Vota have
20 a problem with that employee writing down on the
21 carrier envelope, I'm an employee of Mi Familia Vota
22 assisting at the request of the person?

23 A. The folks that are within our staff
24 that support voter registration, are voter -- like
25 voter -- deputy voter volunteer registrars, and so

1 that in -- I believe she said in the 2020 election,
 2 she asked for assistance from a poll worker and she
 3 didn't feel -- she said she did not feel that the
 4 assistance -- that the assistance that was provided
 5 was essentially mishandling of her ballot and her
 6 voting -- voting choices, and she was not certain
 7 that when she cast her ballot, she had received
 8 appropriate assistance to make her own decisions to
 9 vote.

10 Q. Now, if a poll watcher has been there
 11 to see and hear that and had reported that to a
 12 polling judge, that could have been resolved at the
 13 polling place, right?

14 MR. PROWANT: Objection: Form.

15 THE WITNESS: I can't -- I can't speak
 16 to that.

17 Q. (BY MR. HUDSON) Well, I'm asking you:
 18 Based on the example that you give me, if somebody
 19 was there to catch a person coercing a voter to vote
 20 in a way that they didn't want, that person watching
 21 would be able to report it to a presiding judge,
 22 right?

23 A. Perhaps so. It's very -- I can't speak
 24 to that scenario playing out just like that.

25 Q. Well, you admit that it is a scenario